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Of Attorneys for Mental Health Association of Portland

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

**LEGACY EMANUEL HOSPITAL &  
HEALTH CENTER *et al.***

Plaintiffs/Cross-  
Defendants

vs

**SEJAL HATHI, MD *et al.***

Defendants

Case No. 6:22-cv-01460-AN

**MENTAL HEALTH ASSOCIATION  
OF PORTLAND'S MOTION FOR  
EXTENSION OF TIME TO FILE  
REPLY IN SUPPORT OF MENTAL  
HEALTH ASSOCIATION'S MOTION  
TO INTERVENE**

**LR 7-1 CERTIFICATION**

Pursuant to Local Rule 7-1, Juan Chavez, counsel for Mental Health Association of Portland, hereby certifies that he conferred with counsel for Hospital Corporation Plaintiffs, and they do not oppose this motion.

**RELIEF REQUESTED**

Plaintiff requests an extension of the deadline to file a reply in support of Mental Health Association of Portland's Motion to Intervene.

UNOPPOSED MOTION FOR EXTENSION OF TIME

### **ARGUMENT AND AUTHORITY**

Case schedules can be modified and extended based upon showings of “good cause.” Fed. R. Civ. P. 16(b)(4). The current reply deadline is January 3, 2025. Here, there is good cause for an extension of the reply deadline to January 17, 2025, due to Counsel for Mental Health Association's preplanned time off.

### **CONCLUSION**

Based on the foregoing, Plaintiff requests that this motion be granted, and that the new deadlines be set.

DATED: January 2, 2025.

/s/ Juan C. Chavez  
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Attorney for Plaintiff